

JOSEPH P. RUSSONIELLO (CABN 44332)
United States Attorney

BRIAN J. STRETCH (CABN 163973)
Chief, Criminal Division

CHRISTINE Y. WONG (NYBN 3988607)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Telephone: (415) 436-7301
Facsimile: (415) 436-6753
E-Mail: Christine.Wong@usdoj.gov

Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	No. 09-0862 MHP
)	
v.)	
)	STIPULATED REQUEST CONTINUING
)	STATUS CONFERENCE AND WAIVING
DONALD DANIELS, et al.,)	TIME
)	
Defendants.)	
)	
)	

On November 16, 2009, defendants Donald Daniels, Martin William Washburn, Irina Rebegeneau, Sergei Shkurkin and Tapani Koivunen appeared the Honorable Marilyn H. Patel for a trial setting hearing. The Court ordered that the parties next appear on January 25, 2010, for a status conference. The parties request that this Court vacate that date and set this matter for status conference on March 22, 2009, at 10:00 a.m., and that the Court exclude time under the Speedy Trial Act between the date of this stipulation and March 22, 2009.

The parties make this request because defense counsel and the Government are

1 continuing to conduct investigation of the matter, including preparing and reviewing voluminous
2 discovery, and the parties would require additional preparation time in order to provide effective
3 assistance of counsel.

4 With the agreement of the parties and with the consent of the defendants, the Court enters
5 this order confirming the exclusion of time under the Speedy Trial Act from January 25, 2010,
6 through March 22, 2010. The parties agree and stipulate, and the Court finds and holds, as
7 follows:

8 The ends of justice served by excluding the period from January 25, 2010, through March
9 22, 2010 from Speedy Trial Act calculations outweighs the interests of the public and the
10 defendants in a speedy trial, by ensuring the effective preparation of counsel, in accordance with
11 18 U.S.C. § 3161(h)(8)(A) and (B).

12
13 STIPULATED:

14
15 DATED: January 21, 2010

/s Mary McNamara
MARY MCNAMARA, ESQ.
Attorney for DONALD DANIELS

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18 DATED: January 21, 2010

/s Nanci Clarence
NANCI CLARENCE, ESQ.
Attorney for MARTIN WILLIAM WASHBURN

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20
21 DATED: January 21, 2010

/s Anthony Brass
ANTHONY BRASS, ESQ.
Attorney for IRINA REBEGENEAU

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24 DATED: January 21, 2010

/s Harry Singer
HARRY SINGER, ESQ.
Attorney for TAPANI KOIVUNEN

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27 DATED: January 21, 2010

/s William J. Portanova
WILLIAM J. PORTANOVA, ESQ.
Attorney for SERGEI SHKURKIN

1 DATED: January 21, 2010

/s Christine Y. Wong
CHRISTINE Y. WONG
Assistant United States Attorney

2 IT IS SO ORDERED.
3

4 DATED: January 22, 2010

